

COMMONWEALTH OF VIRGINIA



NORFOLK CIRCUIT COURT
Civil Division
150 ST. PAUL'S BLVD 7TH FLOOR
NORFOLK VA 23510
(757) 769-8539

Summons

To: WAWA, INC.
MEADE SPOTTS, REGISTERED AGENT
411 E. FRANKLIN STREET
RICHMOND VA 23219

Case No. 710CL18010040-00

The party upon whom this summons and the attached complaint are served is hereby notified that unless within 21 days after such service, response is made by filing in the clerk's office of this court a pleading in writing, in proper legal form, the allegations and charges may be taken as admitted and the court may enter an order, judgment, or decree against such party either by default or after hearing evidence.

Appearance in person is not required by this summons.

Done in the name of the Commonwealth of Virginia on, Monday, November 19, 2018

Clerk of Court: GEORGE E. SCHAEFER III

by

A handwritten signature in black ink, appearing to read "G. Schaefer", written over a horizontal line.

(CLERK/DEPUTY CLERK)

Instructions:

Hearing Official:

Attorney's name: ALBISTON, GEORGE T
757-625-1188



VIRGINIA: IN THE CIRCUIT COURT FOR THE CITY OF NORFOLK

JOANNA SEXTON,

Plaintiff,

v.

CASE NO.: _____

WAWA, INC.,

Defendant.

SERVE:

Meade Spotts, Registered Agent
411 E Franklin Street
Suite 600
Richmond, VA 23219

COMPLAINT

TAKE NOTICE that the undersigned hereby moves the Circuit Court for the City of Norfolk, Virginia, at the Courthouse thereof for a judgment and award against you in the sum of Two Hundred Fifty Thousand Dollars (\$250,000.00) with interest and costs for the following, to-wit:

1. That on the 26th day of February, 2015, the plaintiff, Joanna Sexton, was lawfully and properly on the property of the defendant, Wawa, Inc. located at 4377 Holland Road, Virginia Beach, Virginia 23462 in the city of Virginia Beach, Virginia.
2. That at the said time and place, the defendant, Wawa, Inc., owned, maintained and controlled the aforementioned property as a business.
3. That at the said time and place, the defendant, Wawa, Inc., owed a duty to the public to have the property in a reasonably safe condition and to warn the plaintiff of any unsafe condition which the defendant knew or should have known existed on the property.
4. That by reason of the negligence of the defendant, Wawa, Inc., the plaintiff was

caused to fall and receive serious and permanent injuries.

5. That these injuries to the plaintiff have caused and will continue to cause and will in the future cause great physical pain, mental anguish and inconvenience; have required the plaintiff to expend large sums of money for medical expenses and will require her to incur medical expenses in the future; have resulted in lost earnings because she is unable to work at her calling and loss of earnings and lessening of earning capacity that she may reasonably be expected to sustain in the future.

6. As a direct and proximate result of plaintiff's injuries she may reasonably be expected to sustain permanent injuries in the future, and the injuries may reasonably be expected to result in disfigurement and deformity with associated humiliation and embarrassment.

WHEREFORE, the Plaintiff prays for a judgment and an award of execution against the Defendant, in the amount of Two Hundred Fifty Thousand Dollard (\$250,000.00), plus prejudgment from February 26, 2015, post judgment interest and Plaintiff's costs in this cause expended.

Plaintiff further demands a TRIAL BY JURY.

JOANNA SEXTON

By: 

Of Counsel

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